

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

RABBI MARA NATHAN, on behalf of herself and on  
behalf of her minor child, M.N., et al.,

Plaintiffs,

v.

ALAMO HEIGHTS INDEPENDENT SCHOOL  
DISTRICT, et al.,

Defendants.

CIVIL ACTION NO. 5:25-cv-00756

**DECLARATION OF ARVIND CHANDRAKANTAN IN SUPPORT OF  
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

I, Arvind Chandrakantan, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a Plaintiff in the above-captioned matter. I am suing on behalf of myself and on behalf of my minor children, A.C., M.C., and V.C.<sup>1</sup> Our family lives in Sugar Land, Texas.

2. A.C., M.C., and V.C are enrolled in and will attend a public elementary school, middle school, and high school, respectively, in the Fort Bend Independent School District during the 2025-2026 school year. The first day of the upcoming school year is scheduled for August 12, 2025.

3. I am a lifelong Hindu, and my faith is a core part of my identity. I am raising A.C., M.C., and V.C. in the Hindu faith.

4. Because A.C., M.C., and V.C. are fourth-generation Americans, it is very important to me that they are raised in the Hindu tradition and that they stay connected to their Indian

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<sup>1</sup> In accordance with Federal Rule of Civil Procedure 5.2(a)(3), all minor Plaintiffs are identified by their initials.

heritage. A.C., M.C., and V.C. attend a local Hindu mission on Sundays to learn about their faith. In addition, A.C., M.C., and V.C. have previously enrolled in a Hindu heritage summer camp.

5. I understand that Senate Bill No. 10 (“S.B. 10”) requires displays of the Ten Commandments to be hung in a “conspicuous place” in every classroom at A.C., M.C., and V.C.’s schools. The posters or framed copies of the Ten Commandments must be a minimum size of sixteen by twenty inches and printed in a size and typeface that is legible to a person with average vision from anywhere in the classroom. The poster or framed copy must include only the text of the Ten Commandments as set forth in S.B. 10. As a result of these minimum requirements, A.C., M.C., and V.C. will not be able to avoid the displays and will be subjected to them for nearly every hour of the school day.

6. On behalf of myself, and on behalf of A.C., M.C., and V.C., I object to the school displays mandated by S.B.10 because the displays will promote and forcibly impose on A.C., M.C., and V.C. religious scripture that contradicts our family’s religious beliefs. My family does not subscribe to the religious dictates of the Ten Commandments. We particularly object to the first four commandments—stating that there is only one God, prohibiting idol worship, prohibiting use of the Lord’s name in vain, and requiring observing the Sabbath—because they are at odds with Hindu teachings.

7. Specifically, the Ten Commandments assert that there is only one God, whereas Hinduism teaches that there are many manifestations of the Divine. Similarly, the Ten Commandments treat idol worship as categorically wrong, while some Hindu practices include venerating statues or images as physical representations of the Divine.

8. By imposing the Ten Commandments on A.C., M.C., and V.C. for nearly every hour of the school day, the displays mandated by S.B. 10 will interfere with my children’s religious

development and threaten to undermine the beliefs and values I am seeking to instill in them. Indeed, the displays will send A.C., M.C., and V.C. the message—with the apparent endorsement of authority figures, including teachers—that certain aspects of Hindu faith and worship are inherently wrong. By conveying that Christianity is the only acceptable religion in school, the displays will pressure A.C., M.C., and V.C. to observe, meditate on, and venerate the state's preferred religious doctrine.

9. Moreover, the displays will present belief in the Ten Commandments and Christianity as the assumed norm in school and in broader society. This sends the damaging message that A.C., M.C., and V.C. are outsiders in their community because they do not adhere to this scripture and do not share the religious beliefs preferred by the government.

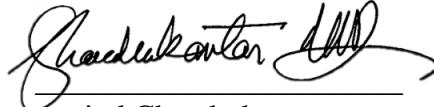
10. The religious displays and feeling like outsiders will put pressure on A.C., M.C., and V.C. to religiously assimilate. I am aware of historical instances in which Christian missionaries used proselytization and forced exposure to Christianity to turn Hindu children away from their Hindu faith. Because of this history, I am particularly sensitive to the negative and permanent impact the school district pushing Christian doctrine will have on A.C., M.C., and V.C. and their Hindu identities.

11. The constant presence of the Ten Commandments in every classroom may also place A.C., M.C., and V.C. in the position of defending our family's Hindu practices, which differ from the Christian beliefs and practices promoted by the displays. Forcing my children to defend or explain their Hindu beliefs and practices imposes an undue burden on them.

12. As a parent, I believe that my role in directing my children's upbringing is one of the most important responsibilities I have as a parent. Imposing permanent, prominently placed displays of religious directives for nearly every hour that my children are in school, in accordance

with S.B. 10, will directly interfere with and substantially burden and undermine my ability to raise my children in the Hindu faith.

I hereby declare under penalty of perjury that the foregoing is true and correct. Executed on July 2, 2025.



Arvind Chandrakantan